

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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CRAIG MOSKOWITZ and BARBARA MOSKOWITZ,  
each on their own behalf, and as parents on behalf of their  
minor child, S.M.,

Docket No.: 20-cv-1659  
(KAM) (SIL)

Plaintiffs,

-against-

GREAT NECK UNION FREE SCHOOL DISTRICT,  
THE BOARD OF EDUCATION OF THE GREAT NECK  
UNION FREE SCHOOL DISTRICT, DANA  
SLACKMAN, DR. GABRIELLA DUKE, KATE  
MUGNO, ROBIN TRICHON, DR. ANTHONY  
IACOVELLI, LUCIANA BRADLEY, and SARA  
GOLDBERG, each Individually, and in their respective  
official capacities,

Defendants.

**NOTICE OF MOTION**

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**PLEASE TAKE NOTICE** that upon the annexed declaration of Michael A. Miranda and the exhibits annexed thereto; the Affidavit of Robin Trichon and the exhibit annexed thereto, the Affidavit of Dr. Anthony Iacovelli and the exhibit annexed thereto, the Affidavit of Kate Mugno, and the accompanying memorandum of law, and upon all pleadings and proceedings heretofore had herein, defendants, GREAT NECK UNION FREE SCHOOL DISTRICT, THE BOARD OF EDUCATION OF THE GREAT NECK UNION FREE SCHOOL DISTRICT, DR. GABRIELLA DUKE, KATE MUGNO, ROBIN TRICHON, DR. ANTHONY IACOVELLI, LUCIANA BRADLEY, and SARA GOLDBERG will move this Court, before the Honorable Judge Kiyo A. Matsumoto, United States District Court Judge at 225 Cadman Plaza East, Brooklyn, New York 11201, on a date to be ordered by the Court, for an Order pursuant to 12(b)(6) of the Federal Rules of Civil Procedure granting the defendants' motion to dismiss for failure to state a claim upon which relief may be granted, and such other further relief as this Court may deem just and proper, including but not limited to the conversion of this motion to a motion for summary judgment under FRCP 12(d), upon notice to the parties.

Dated: Mineola, New York  
October 9, 2020

**MIRANDA SLONE SKLARIN  
VERVENIOTIS LLP**

Attorneys for Defendants GREAT NECK UNION  
FREE SCHOOL DISTRICT, THE BOARD OF  
EDUCATION OF THE GREAT NECK UNION  
FREE SCHOOL DISTRICT, DR. GABRIELLA  
DUKE, KATE MUGNO, ROBIN TRICHON, DR.  
ANTHONY IACOVELLI, LUCIANA BRADLEY,  
and SARA GOLDBERG

A handwritten signature in black ink, appearing to be 'Michael A. Miranda', written over a horizontal line.

By: \_\_\_\_\_  
Michael A. Miranda, Esq.  
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To: All Counsel via ECF